

December 8, 2014



Marlene H. Dortch, Secretary
Federal Communications Commission
Office of the Secretary
445 12th Street, SW
Washington, DC 20554

Dear Ms. Dortch:

Since 1977, PSCU has been a leading provider of traditional and online financial services to credit unions. Today, we represent more than 800 credit unions, making us the nation's leading Credit Union Services Organization. We offer industry-leading credit, debit/ATM and prepaid card servicing to more than 14 million cardholders and innovative bill payment solutions to over a million online bill payment subscribers. We also provide a range of ecommerce solutions options to include electronic home and mobile banking. All of these services are backed by outstanding support from our fully redundant 24/7/365 Total Member Care contact centers. We are pleased to provide the Commission with our brief comments in response to the Commission's November request for comments on the American Banker's Association ("ABA") Petition for certain exemptions from the Telephone Consumer Protection Act ("TCPA") requirements of written consent by consumers.

We support the fraud-related requests in the ABA Petition. Effective fraud protection requires the earliest possible contact with the customer. Text messages and calls to mobile phones offer the fastest delivery of information to consumers. Consumers expect customer service to be delivered quickly and in the most convenient manner, and expect customer service providers to employ the best technology tools for convenience and speed of delivery.

PSCU requests that the Commission exercise its statutory authority to exempt certain time-sensitive informational calls and text messages, placed without charge to the called parties, from the TCPA's restrictions on automated calls and texts to mobile devices. The calls and texts for which the exemption is requested would alert consumers concerning: (1) transactions and events that suggest a risk of fraud or identity theft; (2) possible breaches of the security of customers' personal information; and (3) steps consumers can take to prevent or remedy harm caused by data security breaches. All of these messages serve consumers' interests and can be conveyed most efficiently and reliably by automated calls and texts to consumers' telephones, which increasingly are wireless devices. Accordingly, PSCU requests an order that would permit financial service providers to send messages in these specific categories, using an automatic telephone dialing system and/or an artificial or prerecorded voice, without the recipient's prior express consent, on a free-to-end-user basis, subject to such conditions as the Commission may prescribe as necessary in the interest of the privacy rights the TCPA is intended to protect.

Sincerely,

A handwritten signature in black ink, appearing to read "Steven A. Salzer", is written over a circular stamp. The stamp contains the text "Steven A. Salzer" and "SVP, Legal and General Counsel" in a serif font.

Steven A. Salzer
SVP, Legal and General Counsel